

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

JASON GALANIS,
GARY HIRST,
JOHN GALANIS, a/k/a “Yanni,”
HUGH DUNKERLEY,
MICHELLE MORTON,
DEVON ARCHER, and
BEVAN COONEY,

Defendants.

No. 16 Cr. 371 (RA)

NOTICE OF MOTION FOR SEVERANCE

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, as well as the Declaration of Matthew L. Schwartz, the exhibits thereto, and the pleadings and other filings in this case, defendants Devon Archer and Bevan Cooney respectfully move this Court before the Honorable Ronnie Abrams, United States District Judge, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order severing their trial from the trial of their remaining co-defendants pursuant to Federal Rule of Criminal Procedure 14 and the Sixth Amendment to the United States Constitution.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the deadlines set by the Court by order dated October 27, 2017 [ECF No. 264], the government’s opposition papers are due on February 5, 2018, and reply papers are due on February 12, 2018.

Dated: January 16, 2018
New York, New York

Respectfully submitted,

/s/ Matthew L. Schwartz
Matthew L. Schwartz
BOIES SCHILLER FLEXNER LLP
575 Lexington Avenue, 7th Floor
New York, New York 10022
Tel.: (212) 446-2300
Fax: (212) 446-2350
mlschwartz@bsfllp.com

Attorneys for Devon Archer

/s/ Paula Notari
Paula Notari
THE LAW OFFICE OF
PAULA J. NOTARI
152 West 57th Street, 8th Floor
New York, New York 10019
Tel.: (646) 943-2172
Fax: (212) 980-2968
paulanotari@aol.com

Abraham J. Hassen
O'NEILL / HASSEN
25 Eighth Ave, Suite C
Brooklyn, New York 11217
Tel./Fax.: (212) 203-1858
hassen@oandh.net

Attorneys for Bevan Cooney